

1
2 SUPERIOR COURT OF THE STATE OF CALIFORNIA
3 COUNTY OF SACRAMENTO

4
5 THE PEOPLE OF THE STATE OF CALIFORNIA,

Case No.

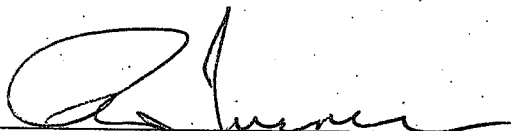
6 Plaintiff,

7 **[PROPOSED] INDICTMENT**

8 v.

8 SHENGCHIEN (JENSEN) TSENG (07/21/1968)
9 MAXAMINA PEREZ (06/08/1967)
10 MARLENE DAVALOS-MENDEZ (04/16/1989)
11 ESTELLA VERONICA CASTILLO (08/08/1982)
12 ALEJANDRA MARTINEZ aka ALEJANDRA
13 LOZARO (05/22/1991)
14 RECYCLE SERVICE ALLIANCE, INC.

15 Defendant.

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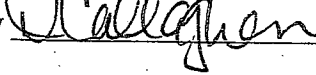
19 Foreperson of the Grand Jury

20 Presented by the foreperson of the Grand Jury in the presence of the Grand Jury, in open Superior
21 Court of the State of California, within and for the County of Sacramento, and filed as a record in
22 said Court this 7th of Dec. 2017

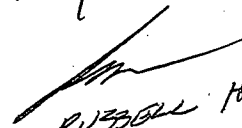
23 _____ Executive Officer/Clerk

24 By _____ Deputy

25 XAVIER BECERRA, Attorney General

26
27 By  Deputy
28

*Pls confirm a 11 term
will not order that
it be filed*


RUSSELL HORN
JUDGE OF THE SUPERIOR COURT

12/6/2017

COUNT 1 Conspiracy

14 of 15 for Yes

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2 On and between January 1, 2012 and September 1, 2016, in the County of Sacramento, the
3 crime of CONSPIRACY TO COMMIT A CRIME, in violation of PENAL CODE SECTION
4 182(a)(1), a felony, was committed by SHENGCHIEN (JENSEN) TSENG, MAXAMINA
5 PEREZ, MARLENE DAVALOS-MENDEZ, ESTELLA VERONICA CASTILLO,
6 ALEXANDRA MARTINEZ aka ALEJANDRA LOZARO, RECYCLE SERVICES
7 ALLIANCE, INC., who did unlawfully conspire together and with another person and persons
8 whose identity is unknown to commit the crimes of Grand Theft in violation of Penal Code
9 section 487(a), Recycling Fraud in violation of Public Resources Code sections 14591(b)(1)(A),
10 felonies, Penal Code section 132, a felony, Penal Code section 134, a felony, Penal Code section
11 115(a), a felony; and Penal Code section 118, a felony, that pursuant to and for the purpose of
12 carrying out the objects and purposes of aforesaid conspiracy, the said defendants committed the
13 following overt act and acts at and in the County of Sacramento:
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16 I

17 On or about February 6, 2012 submitted a claim for payment in the amount of \$69,465.33

18 II

19 On or about February 22, 2012 submitted a claim for payment in the amount of \$4757.76

20 III

21 On or about March 8, 2012 submitted a claim for payment in the amount of \$110.37

22 IV

23 On or about April 2, 2012 submitted a claim for payment in the amount of \$91,755.98.

24 V

25 On or about May 8, 2012 submitted a claim for payment in the amount of \$88,849.68

26 VI

1 On or about June 1, 2012 submitted a claim for payment in the amount of \$168,006.79
2 VII
3 On or about July 3, 2012 submitted a claim for payment in the amount of \$145,658.22
4 VIII
5 On or about August 1, 2012 submitted a claim for payment in the amount of \$155,092.39
6 IX
7 On or about September 4, 2012 submitted a claim for payment in the amount of \$24,989.49
8 X
9 On or about October 1, 2012 submitted a claim for payment in the amount of \$53,484.69
10 XI
11 On or about November 19, 2012 submitted a claim for payment in the amount of \$7,775.05
12 XII
13 On or about December 7, 2012 submitted a claim for payment in the amount of \$34,735.45
14 XIII
15 On or about January 2, 2013 submitted a claim for payment in the amount of 29,864.39
16 XIV
17 On or about February 20, 2013 submitted a claim for payment in the amount of \$6,349.00
18 XV
19 On or about March 1, 2013 submitted a claim for payment in the amount of \$58, 881.34
20 XVI
21 On or about April 2, 2013 submitted a claim for payment in the amount of \$80,487.31
22 XVII
23 On or about May 2, 2013 submitted a claim for payment in the amount of \$116,849.12
24 XVIII
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1 On or about June 4, 2013 submitted a claim for payment in the amount of \$63,796.92
2 XIX
3 On or about July 9, 2013 submitted a claim for payment in the amount of \$212,841.03
4 XX
5 On or about August 2, 2013 submitted a claim for payment in the amount of \$65,586.32
6 XXI
7 On or about September 5, 2013 submitted a claim for payment in the amount of \$53,243.61
8 XXII
9 On or about October 1, 2013 submitted a claim for payment in the amount of \$20,56.18
10 XXIII
11 On or about November 1, 2013 submitted a claim for payment in the amount of \$28,110.13
12 XXIV
13 On or about December 5, 2013 submitted a claim for payment in the amount of \$41,971.40
14 XXV
15 On or about January 2, 2014 submitted a claim for payment in the amount of \$30,965.91
16 XXVI
17 On or about February 3, 2014 submitted a claim for payment in the amount of \$15,143.22
18 XXVII
19 On or about March 5, 2014 submitted a claim for payment in the amount of \$61,421.79
20 XXVIII
21 On or about April 1, 2014 submitted a claim for payment in the amount of \$78,476.77
22 XXIX
23 On or about May 1, 2014 submitted a claim for payment in the amount of \$40,150.05
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On or about June 3, 2014 submitted a claim for payment in the amount of \$29,824.71

XXXI

On or about July 1, 2014 submitted a claim for payment in the amount of \$47,135.97

XXXII

On or about August 1, 2014 submitted a claim for payment in the amount of \$56,818.57

XXXIII

On or about September 1, 2014 submitted a claim for payment in the amount of \$61,762.47

XXXIV

On or about October 1, 2014 submitted a claim for payment in the amount of \$20,379.64

XXXV

On or about November 3, 2014 submitted a claim for payment in the amount of \$18,938.62

XXXVI

On or about December 2, 2014 submitted a claim for payment in the amount of \$47,565.76

XXXVII

On or about January 6, 2015 submitted a claim for payment in the amount of \$62,956.90

XXXVIII

On or about February 3, 2015 submitted a claim for payment in the amount of \$59,020.99

XXXIX

On or about March 9, 2015 submitted a claim for payment in the amount of \$76,005.16

XL

On or about April 1, 2015 submitted a claim for payment in the amount of \$59,276.67

XLI

On or about May 4, 2015 submitted a claim for payment in the amount of \$52,153.98

XLII

1 On or about June 1, 2015 submitted a claim for payment in the amount of \$57,028.64

2 XLIII

3 On or about July 6, 2015 submitted a claim for payment in the amount of \$51,282.43

4 XLIV

5 On or about August 24, 2015 submitted a claim for payment in the amount of \$70,030.11

6 XLV

7 On or about September 1, 2015 submitted a claim for payment in the amount of \$68,215.81

8 XLVI

9 On or about October 1, 2015 submitted a claim for payment in the amount of \$45,681.64

10 XLVII

11 On or about November 16, 2015, submitted a claim for payment in the amount of \$68,495.11.

12 XLVIII

13 On or about December 1, 2015, submitted a claim for payment in the amount of \$43,878.89

14 115(a)COUNT 2

15 On and between February 1, 2012 – February 29, 2012, in the County of Sacramento, the ^{Count} ^{to 156} ^{all IS GO YES}

16 crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE
17 SECTION 487 (a), a felony was committed by SHENGCHIEN (JENSEN) TSENG,
18 MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC., who did unlawfully
19 take money and personal property of a value exceeding \$950, to wit MONEY, the property of the
20 STATE OF CALIFORNIA.
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22 COUNT 3

23 On and between February 1, 2012 – February 29, 2012, in the County of Sacramento, the
24 crime of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation
25 of Public Resources Code section 14591 (b) (1) (A) a felony was committed by SHENGCHIEN
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1 (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,
2 who with the intent to defraud the State of California did submit a false or fraudulent claim for
3 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number 87335.
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5 COUNT 4

6 On and between February 1, 2012 – February 29, 2012, in violation of Penal Code section 115(a)
7 , in the County of Sacramento, SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ,
8 AND RECYCLE SERVICES ALLIANCE INC., did unlawfully and knowingly procure and
9 offer a false and forged instrument to be filed, registered, and recorded in a public office within
10 this state, which instrument, if genuine, might be filed, registered, and recorded under a law of
11 this state or the United States to wit: DR7 number 87335.
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13 COUNT 5

14 On and between March 1, 2012 – March 31, 2012, in the County of Sacramento, the crime
15 of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487
16 (a), a felony was committed by SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ,
17 AND RECYCLE SERVICES ALLIANCE INC., who did unlawfully take money and personal
18 property of a value exceeding \$950, to wit MONEY, the property of the STATE OF
19 CALIFORNIA.
20

21 COUNT 6

22 On and between March 1, 2012 – March 31, 2012, in the County of Sacramento, the crime
23 of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of
24 Public Resources Code section 14591 (b) (1) (A) a felony was committed by SHENGCHIEN
25 (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,
26 who with the intent to defraud the State of California did submit a false or fraudulent claim for
27 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number 88788.
28

COUNT 7

On and between March 1, 2012 – March 31, 2012, in violation of Penal Code section 115(a), in the County of Sacramento **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States 115(a) to wit DR7 number 88788.

COUNT 8

On and between April 1, 2012 – April 30, 2012, in the County of Sacramento, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, who did unlawfully take money and personal property of a value exceeding \$950, to wit MONEY, the property of the STATE OF CALIFORNIA.

COUNT 9

On and between April 1, 2012 – April 30, 2012, in the County of Sacramento, the crime of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, who with the intent to defraud the State of California did submit a false or fraudulent claim for payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number 92210.

COUNT 10

On and between April 1, 2012 – April 30, 2012, in violation of Penal Code section 115(a), in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND**

1 **RECYCLE SERVICES ALLIANCE INC.**, did unlawfully and knowingly procure and offer a
2 false and forged instrument to be filed, registered, and recorded in a public office within this state,
3 which instrument, if genuine, might be filed, registered, and recorded under a law of this state or
4 the United States 115(a) to wit DR7 number 92210.
5

6 COUNT 11

7 On and between May 1, 2012 – May 31, 2012, in the County of Sacramento, the crime of
8 GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487
9 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ,**
10 **AND RECYCLE SERVICES ALLIANCE INC.**, who did unlawfully take money and personal
11 property of a value exceeding \$950, to wit MONEY, the property of the STATE OF
12 CALIFORNIA.
13

14 COUNT 12

15 On and between May 1, 2012 – May 31, 2012, in the County of Sacramento, the crime of
16 SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of Public
17 Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
18 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**,
19 who with the intent to defraud the State of California did submit a false or fraudulent claim for
20 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number 95517.
21

22 COUNT 13

23 On and between May 1, 2012 – May 31, 2012, in violation of Penal Code section 115(a), in
24 the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND**
25 **RECYCLE SERVICES ALLIANCE INC.**, did unlawfully and knowingly procure and offer a
26 false and forged instrument to be filed, registered, and recorded in a public office within this state,
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1 which instrument, if genuine, might be filed, registered, and recorded under a law of this state or
2 the United States 115(a) to wit DR7 number 95517.

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4 COUNT 14

5 On and between June 1, 2012 – June 30, 2012, in the County of Sacramento, the crime of
6 GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487
7 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ,**
8 **AND RECYCLE SERVICES ALLIANCE INC.,** who did unlawfully take money and personal
9 property of a value exceeding \$950, to wit MONEY, the property of the STATE OF
10 CALIFORNIA.

11
12 COUNT 15

13 On and between June 1, 2012 – June 30, 2012, in the County of Sacramento, the crime of
14 SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of Public
15 Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
16 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,**
17 who with the intent to defraud the State of California did submit a false or fraudulent claim for
18 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number 97374.

19
20 -COUNT 16

21 On and between June 1, 2012 – June 30, 2012, in violation of Penal Code section 115(a), in
22 the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND**
23 **RECYCLE SERVICES ALLIANCE INC.,** did unlawfully and knowingly procure and offer a
24 false and forged instrument to be filed, registered, and recorded in a public office within this state,
25 which instrument, if genuine, might be filed, registered, and recorded under a law of this state or
26 the United States 115(a) to wit DR7 number 97374 .

27
28 COUNT 17

1 On and between July 1, 2012 – July 31, 2012, in the County of Sacramento, the crime of
2 GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487
3 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ,**
4 **AND RECYCLE SERVICES ALLIANCE INC.,** who did unlawfully take money and personal
5 property of a value exceeding \$950, to wit MONEY, the property of the STATE OF
6 CALIFORNIA.
7

8 COUNT 18

9 On and between July 1, 2012 – July 31, 2012, in the County of Sacramento, the crime of
10 SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of Public
11 Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
12 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,**
13 who with the intent to defraud the State of California did submit a false or fraudulent claim for
14 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
15 100550.
16

17 COUNT 19

18 On and between July 1, 2012 – July 31, 2012, in violation of Penal Code section 115(a), in
19 the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND**
20 **RECYCLE SERVICES ALLIANCE INC.,** did unlawfully and knowingly procure and offer a
21 false and forged instrument to be filed, registered, and recorded in a public office within this state,
22 which instrument, if genuine, might be filed, registered, and recorded under a law of this state or
23 the United States 115(a) to wit DR7 number 100550.
24

25 COUNT 20

26 On and between August 1, 2012 – August 31, 2012, in the County of Sacramento, the crime
27 of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487
28

1 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ,**
2 **AND RECYCLE SERVICES ALLIANCE INC.**, who did unlawfully take money and personal
3 property of a value exceeding \$950, to wit MONEY, the property of the STATE OF
4 CALIFORNIA.

5
6 COUNT 21

7 On and between August 1, 2012 – August 31, 2012, in the County of Sacramento, the crime
8 of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of
9 Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
10 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**,
11 who with the intent to defraud the State of California did submit a false or fraudulent claim for
12 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
13 103344.
14

15 COUNT 22

16 On and between August 1, 2012 – August 31, 2012, in violation of Penal Code section
17 115(a), in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA**
18 **PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, did unlawfully and knowingly
19 procure and offer a false and forged instrument to be filed, registered, and recorded in a public
20 office within this state, which instrument, if genuine, might be filed, registered, and recorded
21 under a law of this state or the United States 115(a) to wit DR7 number 103344.
22

23 COUNT 23

24 On and between September 1, 2012 – September 30, 2012, in the County of Sacramento, the
25 crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE
26 SECTION 487 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG,**
27 **MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, who did unlawfully
28

1 take money and personal property of a value exceeding \$950, to wit MONEY, the property of the
2 STATE OF CALIFORNIA.

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4 COUNT 24

5 On and between September 1, 2012 – September 30, 2012, in the County of Sacramento, the
6 crime of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation
7 of Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
8 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,**
9 who with the intent to defraud the State of California did submit a false or fraudulent claim for
10 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
11 104939.

12
13 COUNT 25

14 On and between September 1, 2012 – September 30, 2012, in violation of Penal Code
15 section 115(a), in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG,**
16 **MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** did unlawfully and
17 knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in
18 a public office within this state, which instrument, if genuine, might be filed, registered, and
19 recorded under a law of this state or the United States 115(a) to wit DR7 number 104939.

20
21 COUNT 26

22 On and between October 1, 2012 – October 31, 2012, in the County of Sacramento, the
23 crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE
24 SECTION 487 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG,**
25 **MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** who did unlawfully
26 take money and personal property of a value exceeding \$950, to wit MONEY, the property of the
27 STATE OF CALIFORNIA.
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COUNT 27

On and between October 1, 2012 – October 31, 2012, in the County of Sacramento, the crime of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** who with the intent to defraud the State of California did submit a false or fraudulent claim for payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number 108413.

COUNT 28

On and between October 1, 2012 – October 31, 2012, in violation of Penal Code section 115(a), in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States 115(a) to wit DR7 number 108413.

COUNT 29

On and between November-1, 2012 – November 30, 2012, in the County of Sacramento, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** who did unlawfully take money and personal property of a value exceeding \$950, to wit MONEY, the property of the STATE OF CALIFORNIA.

COUNT 30

1 On and between November 1, 2012 – November 30, 2012, in the County of Sacramento, the
2 crime of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation
3 of Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
4 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,**
5 who with the intent to defraud the State of California did submit a false or fraudulent claim for
6 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
7 113298.
8

9 COUNT 31

10 On and between November 1, 2012 – November 30, 2012, in violation of Penal Code section
11 115(a), in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA**
12 **PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** did unlawfully and knowingly
13 procure and offer a false and forged instrument to be filed, registered, and recorded in a public
14 office within this state, which instrument, if genuine, might be filed, registered, and recorded
15 under a law of this state or the United States 115(a) to wit DR7 number 113298.
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17 COUNT 32

18 On and between December 1, 2012 – December 31, 2012, in the County of Sacramento, the
19 crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE
20 SECTION 487 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG,**
21 **MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** who did unlawfully
22 take money and personal property of a value exceeding \$950, to wit MONEY, the property of the
23 STATE OF CALIFORNIA.
24

25 COUNT 33

26 On and between December 1, 2012 – December 31, 2012, in the County of Sacramento, the
27 crime of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation
28

1 of Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
2 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,**
3 who with the intent to defraud the State of California did submit a false or fraudulent claim for
4 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
5 114794.
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7 COUNT 34

8 On and between December 1, 2012 – December 31, 2012, in violation of Penal Code section
9 115(a), in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA**
10 **PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** did unlawfully and knowingly
11 procure and offer a false and forged instrument to be filed, registered, and recorded in a public
12 office within this state, which instrument, if genuine, might be filed, registered, and recorded
13 under a law of this state or the United States 115(a) to wit DR7 number 114794.
14

15 COUNT 35

16 On and between January 1, 2013 – January 31, 2013, in the County of Sacramento, the crime
17 of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487
18 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ,**
19 **AND RECYCLE SERVICES ALLIANCE INC.,** who did unlawfully take money and personal
20 property of a value exceeding \$950, to wit MONEY, the property of the STATE OF
21 CALIFORNIA.
22

23 COUNT 36

24 On and between January 1, 2013 – January 31, 2013, in the County of Sacramento, the crime
25 of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of
26 Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
27 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,**
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1 who with the intent to defraud the State of California did submit a false or fraudulent claim for
2 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
3 117360.
4

5 COUNT 37

6 On and between January 1, 2013 – January 31, 2013, in violation of Penal Code section
7 115(a), in the County of Sacramento **SHENGCHIEN (JENSEN) TSENG, MAXAMINA**
8 **PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, did unlawfully and knowingly
9 procure and offer a false and forged instrument to be filed, registered, and recorded in a public
10 office within this state, which instrument, if genuine, might be filed, registered, and recorded
11 under a law of this state or the United States 115(a) to wit DR7 number 117360.
12

13 COUNT 38

14 On and between February 1, 2013 – February 29, 2013, in the County of Sacramento, the
15 crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE
16 SECTION 487 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG,**
17 **MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, who did unlawfully
18 take money and personal property of a value exceeding \$950; to wit MONEY, the property of the
19 STATE OF CALIFORNIA.
20

21 COUNT 39

22 On and between February 1, 2013 – February 29, 2013, in the County of Sacramento, the
23 crime of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation
24 of Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
25 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,**
26 who with the intent to defraud the State of California did submit a false or fraudulent claim for
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1 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
2 123667.

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COUNT 40

On and between February 1, 2013 – February 29, 2013, in violation of Penal Code section 115(a), in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States 115(a) to wit DR7 number 123667.

COUNT 41

On and between March 1, 2013 – March 31, 2013, in the County of Sacramento, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, who did unlawfully take money and personal property of a value exceeding \$950, to wit MONEY, the property of the STATE OF CALIFORNIA.

COUNT 42

On and between March 1, 2013 – March 31, 2013, in the County of Sacramento, the crime of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, who with the intent to defraud the State of California did submit a false or fraudulent claim for payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number 124573.

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COUNT 43

On and between March 1, 2013 – March 31, 2013, in violation of Penal Code section 115(a), in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States 115(a) to wit DR7 number 124573.

COUNT 44

On and between April 1, 2013 – April 30, 2013, in the County of Sacramento, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, who did unlawfully take money and personal property of a value exceeding \$950, to wit MONEY, the property of the STATE OF CALIFORNIA.

COUNT 45

On and between April 1, 2013 – April 31, 2013, in the County of Sacramento, the crime of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, who with the intent to defraud the State of California did submit a false or fraudulent claim for payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number 127740.

COUNT 46

1 On and between April 1, 2013 – April 30, 2013, in violation of Penal Code section 115(a), in
2 the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND**
3 **RECYCLE SERVICES ALLIANCE INC.**, did unlawfully and knowingly procure and offer a
4 false and forged instrument to be filed, registered, and recorded in a public office within this state,
5 which instrument, if genuine, might be filed, registered, and recorded under a law of this state or
6 the United States to wit DR7 number 127740.

8 COUNT 47

9 On and between May 1, 2013 – May 31, 2013, in the County of Sacramento, the crime of
10 GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487
11 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ,**
12 **AND RECYCLE SERVICES ALLIANCE INC.**, who did unlawfully take money and personal
13 property of a value exceeding \$950, to wit MONEY, the property of the STATE OF
14 CALIFORNIA.

16 COUNT 48

17 On and between May 1, 2013 – May 31, 2013, in the County of Sacramento, the crime of
18 SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of Public
19 Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
20 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**,
21 who with the intent to defraud the State of California did submit a false or fraudulent claim for
22 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
23 131111.

25 COUNT 49

26 On and between May 1, 2013 – May 31, 2013, in violation of Penal Code section 115(a), in
27 the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND**
28

1 **RECYCLE SERVICES ALLIANCE INC.**, did unlawfully and knowingly procure and offer a
2 false and forged instrument to be filed, registered, and recorded in a public office within this state,
3 which instrument, if genuine, might be filed, registered, and recorded under a law of this state or
4 the United States to wit DR7 number 131111.

5
6 COUNT 50

7 On and between June 1, 2013 – June 30, 2013, in the County of Sacramento, the crime of
8 GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487
9 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ,**
10 **AND RECYCLE SERVICES ALLIANCE INC.**, who did unlawfully take money and personal
11 property of a value exceeding \$950, to wit MONEY, the property of the STATE OF
12 CALIFORNIA.

13
14 COUNT 51

15 On and between June 1, 2013 – June 30, 2013, in the County of Sacramento, the crime of
16 SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of Public
17 Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
18 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**,
19 who with the intent to defraud the State of California did submit a false or fraudulent claim for
20 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
21 134214.

22
23 COUNT 52

24 On and between June 1, 2013 – June 30, 2013, in violation of Penal Code section 115(a), in
25 the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND**
26 **RECYCLE SERVICES ALLIANCE INC.**, did unlawfully and knowingly procure and offer a
27 false and forged instrument to be filed, registered, and recorded in a public office within this state,
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1 which instrument, if genuine, might be filed, registered, and recorded under a law of this state or
2 the United States to wit DR7 number 134214.

3
4 COUNT 53

5 On and between July 1, 2013 – July 31, 2013, in the County of Sacramento, the crime of
6 GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487
7 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ,**
8 **AND RECYCLE SERVICES ALLIANCE INC.,** who did unlawfully take money and personal
9 property of a value exceeding \$950, to wit MONEY, the property of the STATE OF
10 CALIFORNIA.

11
12 COUNT 54

13 On and between July 1, 2013 – July 31, 2013, in the County of Sacramento, the crime of
14 SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of Public
15 Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
16 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,**
17 who with the intent to defraud the State of California did submit a false or fraudulent claim for
18 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
19 137966.

20
21 COUNT 55

22 On and between July 1, 2013 – July 31, 2013, in violation of Penal Code section 115(a), in
23 the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND**
24 **RECYCLE SERVICES ALLIANCE INC.,** did unlawfully and knowingly procure and offer a
25 false and forged instrument to be filed, registered, and recorded in a public office within this state,
26 which instrument, if genuine, might be filed, registered, and recorded under a law of this state or
27 the United States to wit DR7 number 137966.
28

COUNT 56

On and between August 1, 2013 – August 31, 2013, in the County of Sacramento, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, who did unlawfully take money and personal property of a value exceeding \$950, to wit MONEY, the property of the STATE OF CALIFORNIA.

COUNT 57

On and between August 1, 2013 – August 31, 2013, in the County of Sacramento, the crime of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, who with the intent to defraud the State of California did submit a false or fraudulent claim for payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number 140567.

COUNT 58

On and between August 1, 2013 – August 31, 2013, in violation of Penal Code section 115(a), in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States to wit DR7 number 140567.

COUNT 59

1 On and between September 1, 2013 – September 30, 2013, in the County of Sacramento, the
2 crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE
3 SECTION 487 (a), a felony was committed by SHENGCHIEN (JENSEN) TSENG,
4 MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC., who did unlawfully
5 take money and personal property of a value exceeding \$950, to wit MONEY, the property of the
6 STATE OF CALIFORNIA.
7

8 COUNT 60

9 On and between September 1, 2013 – September 30, 2013, in the County of Sacramento, the
10 crime of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation
11 of Public Resources Code section 14591 (b) (1) (A) a felony was committed by SHENGCHIEN
12 (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,
13 who with the intent to defraud the State of California did submit a false or fraudulent claim for
14 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
15 144769.
16

17 COUNT 61

18 On and between September 1, 2013 – September 30, 2013, in violation of Penal Code
19 section 115(a), in the County of Sacramento, SHENGCHIEN (JENSEN) TSENG,
20 MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC., did unlawfully and
21 knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in
22 a public office within this state, which instrument, if genuine, might be filed, registered, and
23 recorded under a law of this state or the United States to wit DR7 number 144769.
24

25 COUNT 62

26 On and between October 1, 2013 – October 31, 2013, in the County of Sacramento, the
27 crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE
28

1 SECTION 487 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG,**
2 **MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** who did unlawfully
3 take money and personal property of a value exceeding \$950, to wit MONEY, the property of the
4 STATE OF CALIFORNIA.

5
6 COUNT 63

7 On and between October 1, 2013 – October 31, 2013, in the County of Sacramento, the
8 crime of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation
9 of Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
10 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE**
11 **INC.,** who with the intent to defraud the State of California did submit a false or fraudulent claim
12 for payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
13 147490.
14

15 COUNT 64

16 On and between October 1, 2013 – October 31, 2013, in violation of Penal Code section
17 115(a), in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA**
18 **PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** did unlawfully and knowingly
19 procure and offer a false and forged instrument to be filed, registered, and recorded in a public
20 office within this state, which instrument, if genuine, might be filed, registered, and recorded
21 under a law of this state or the United States to wit DR7 number 147490.
22

23 COUNT 65

24 On and between November 1, 2013 – November 30, 2013, in the County of Sacramento, the
25 crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE
26 SECTION 487 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG,**
27 **MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** who did unlawfully
28

1 take money and personal property of a value exceeding \$950, to wit MONEY, the property of the
2 STATE OF CALIFORNIA.

3
4 COUNT 66

5 On and between November 1, 2013 – November 30, 2013, in the County of Sacramento, the
6 crime of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation
7 of Public Resources Code section 14591 (b) (1) (A) a felony was committed by SHENGCHIEN
8 (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,
9 who with the intent to defraud the State of California did submit a false or fraudulent claim for
10 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
11 150872.

12
13 COUNT 67

14 On and between November 1, 2013 – November 30, 2013, in violation of Penal Code section
15 115(a), in the County of Sacramento, SHENGCHIEN (JENSEN) TSENG, MAXAMINA
16 PEREZ, AND RECYCLE SERVICES ALLIANCE INC., did unlawfully and knowingly
17 procure and offer a false and forged instrument to be filed, registered, and recorded in a public
18 office within this state, which instrument, if genuine, might be filed, registered, and recorded
19 under a law of this state or the United States to wit DR7 number 150872.

20
21 COUNT 68

22 On and between December 1, 2013 – December 31, 2013, in the County of Sacramento, the
23 crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE
24 SECTION 487 (a), a felony was committed by SHENGCHIEN (JENSEN) TSENG,
25 MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC., who did unlawfully
26 take money and personal property of a value exceeding \$950, to wit MONEY, the property of the
27 STATE OF CALIFORNIA.
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COUNT 69

On and between December 1, 2013 – December 31, 2013, in the County of Sacramento, the crime of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** who with the intent to defraud the State of California did submit a false or fraudulent claim for payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number 154198.

COUNT 70

On and between December 1, 2013 – December 31, 2013, in violation of Penal Code section 115(a), in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States to wit DR7 number 154198.

COUNT 71

On and between January 1, 2014 – January 31, 2014, in the County of Sacramento, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** who did unlawfully take money and personal property of a value exceeding \$950, to wit MONEY, the property of the STATE OF CALIFORNIA.

COUNT 72

1 On and between January 1, 2014 – January 31, 2014, in the County of Sacramento, the crime
2 of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of
3 Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
4 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,**
5 who with the intent to defraud the State of California did submit a false or fraudulent claim for
6 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
7 156793.
8

9 COUNT 73

10 On and between January 1, 2014 – January 31, 2014, in violation of Penal Code section
11 115(a), in the County of Sacramento **SHENGCHIEN (JENSEN) TSENG, MAXAMINA**
12 **PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** did unlawfully and knowingly
13 procure and offer a false and forged instrument to be filed, registered, and recorded in a public
14 office within this state, which instrument, if genuine, might be filed, registered, and recorded
15 under a law of this state or the United States to wit DR7 number 156793.
16

17 COUNT 74

18 On and between February 1, 2014 – February 28, 2014, in the County of Sacramento, the
19 crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE
20 SECTION 487 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG,**
21 **MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** who did unlawfully
22 take money and personal property of a value exceeding \$950, to wit MONEY, the property of the
23 STATE OF CALIFORNIA.
24

25 COUNT 75

26 On and between February 1, 2014 – February 28, 2014, in the County of Sacramento, the
27 crime of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation
28

1 of Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
2 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE**
3 **INC.**, who with the intent to defraud the State of California did submit a false or fraudulent claim
4 for payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
5 160373.
6

7 **COUNT 76**

8 On and between February 1, 2014 – February 28, 2014, in violation of Penal Code section
9 115(a), in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA**
10 **PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, did unlawfully and knowingly
11 procure and offer a false and forged instrument to be filed, registered, and recorded in a public
12 office within this state, which instrument, if genuine, might be filed, registered, and recorded
13 under a law of this state or the United States to wit DR7 number 160373.
14

15 **COUNT 77**

16 On and between March 1, 2014 – March 31, 2014, in the County of Sacramento, the crime
17 of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487.
18 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ,**
19 **AND RECYCLE SERVICES ALLIANCE INC.**, who did unlawfully take money and personal
20 property of a value exceeding \$950, to wit MONEY, the property of the STATE OF
21 CALIFORNIA:
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23 **COUNT 78**

24 On and between March 1, 2014 – March 31, 2014, in the County of Sacramento, the crime
25 of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of
26 Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
27 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**,
28

1 who with the intent to defraud the State of California did submit a false or fraudulent claim for
2 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
3 163889.

4
5 COUNT 79

6 On and between March 1, 2014 – March 31, 2014, in violation of Penal Code section 115(a),
7 in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ,**
8 **AND RECYCLE SERVICES ALLIANCE INC.,** did unlawfully and knowingly procure and
9 offer a false and forged instrument to be filed, registered, and recorded in a public office within
10 this state, which instrument, if genuine, might be filed, registered, and recorded under a law of
11 this state or the United States to wit DR7 number 163889.

12
13 COUNT 80

14 On and between April 1, 2014 – April 30, 2014, in the County of Sacramento, the crime of
15 GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487
16 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ,**
17 **AND RECYCLE SERVICES ALLIANCE INC.,** who did unlawfully take money and personal
18 property of a value exceeding \$950, to wit MONEY, the property of the STATE OF
19 CALIFORNIA.

20
21 COUNT 81

22 On and between April 1, 2014 – April 31, 2014, in the County of Sacramento, the crime of
23 SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of Public
24 Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
25 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,**
26 who with the intent to defraud the State of California did submit a false or fraudulent claim for
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28

1 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
2 166653.

3
4 COUNT 82

5 On and between April 1, 2014 – April 30, 2014, in violation of Penal Code section 115(a),
6 in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ,**
7 **AND RECYCLE SERVICES ALLIANCE INC.,** did unlawfully and knowingly procure and
8 offer a false and forged instrument to be filed, registered, and recorded in a public office within
9 this state, which instrument, if genuine, might be filed, registered, and recorded under a law of
10 this state or the United States to wit DR7 number 166653.

11
12 COUNT 83

13 On and between May 1, 2014 – May 31, 2014, in the County of Sacramento, the crime of
14 GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487
15 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ,**
16 **AND RECYCLE SERVICES ALLIANCE INC.,** who did unlawfully take money and personal
17 property of a value exceeding \$950, to wit MONEY, the property of the STATE OF
18 CALIFORNIA.

19
20 COUNT 84

21 On and between May 1, 2014 – May 31, 2014, in the County of Sacramento, the crime of
22 SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of Public
23 Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
24 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,**
25 who with the intent to defraud the State of California did submit a false or fraudulent claim for
26 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
27 170373.
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COUNT 85

On and between May 1, 2014 – May 31, 2014, in violation of Penal Code section 115(a), in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States to wit DR7 number 170373.

COUNT 86

On and between June 1, 2014 – June 30, 2014, in the County of Sacramento, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, who did unlawfully take money and personal property of a value exceeding \$950, to wit MONEY, the property of the STATE OF CALIFORNIA.

COUNT 87

On and between June 1, 2014 – June 30, 2014, in the County of Sacramento, the crime of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, who with the intent to defraud the State of California did submit a false or fraudulent claim for payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number 173230.

COUNT 88

1 On and between June 1, 2014 – June 30, 2014 in violation of Penal Code section 115(a), in
2 the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND**
3 **RECYCLE SERVICES ALLIANCE INC.**, did unlawfully and knowingly procure and offer a
4 false and forged instrument to be filed, registered, and recorded in a public office within this state,
5 which instrument, if genuine, might be filed, registered, and recorded under a law of this state or
6 the United States to wit DR7 number 173230.
7

8 COUNT 89

9 On and between July 1, 2014 – July 31, 2014, in the County of Sacramento, the crime of
10 GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487
11 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ,**
12 **AND RECYCLE SERVICES ALLIANCE INC.**, who did unlawfully take money and personal
13 property of a value exceeding \$950, to wit MONEY, the property of the STATE OF
14 CALIFORNIA.
15

16 COUNT 90

17 On and between July 1, 2014 – July 31, 2014, in the County of Sacramento, the crime of
18 SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of Public
19 Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
20 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE**
21 **INC.**, who with the intent to defraud the State of California did submit a false or fraudulent claim
22 for payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
23 176457.
24

25 COUNT 91

26 On and between July 1, 2014 – July 31, 2014, in violation of Penal Code section 115(a), in
27 the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND**
28

1 **RECYCLE SERVICES ALLIANCE INC.**, did unlawfully and knowingly procure and offer a
2 false and forged instrument to be filed, registered, and recorded in a public office within this state,
3 which instrument, if genuine, might be filed, registered, and recorded under a law of this state or
4 the United States to wit DR7 number 176457.

5
6 COUNT 92

7 On and between August 1, 2014 – August 31, 2014, in the County of Sacramento, the crime
8 of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487
9 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ,**
10 **AND RECYCLE SERVICES ALLIANCE INC.**, who did unlawfully take money and personal
11 property of a value exceeding \$950, to wit MONEY, the property of the STATE OF
12 CALIFORNIA.

13
14 COUNT 93

15 On and between August 1, 2014 – August 31, 2014, in the County of Sacramento, the crime
16 of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of
17 Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
18 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**,
19 who with the intent to defraud the State of California did submit a false or fraudulent claim for
20 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
21 180145.

22
23 COUNT 94

24 On and between August 1, 2014 – August 31, 2014, in violation of Penal Code section
25 115(a), in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA**
26 **PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, did unlawfully and knowingly
27 procure and offer a false and forged instrument to be filed, registered, and recorded in a public
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1 office within this state, which instrument, if genuine, might be filed, registered, and recorded
2 under a law of this state or the United States to wit DR7 number 180145.

3
4 COUNT 95

5 On and between September 1, 2014 – September 30, 2014, in the County of Sacramento, the
6 crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE
7 SECTION 487 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG,**
8 **MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** who did unlawfully
9 take money and personal property of a value exceeding \$950, to wit MONEY, the property of the
10 STATE OF CALIFORNIA.

11
12 COUNT 96

13 On and between September 1, 2014 – September 30, 2014, in the County of Sacramento, the
14 crime of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation
15 of Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
16 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,**
17 who with the intent to defraud the State of California did submit a false or fraudulent claim for
18 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
19 183501.

20
21 COUNT 97

22 On and between September 1, 2014 – September 30, 2014, in violation of Penal Code
23 section 115(a), in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG,**
24 **MAXAMINA PEREZ, AND RECYCLE-SERVICES ALLIANCE INC.,** did unlawfully and
25 knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in
26 a public office within this state, which instrument, if genuine, might be filed, registered, and
27 recorded under a law of this state or the United States to wit DR7 number 183501.
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COUNT 98

On and between October 1, 2014 – October 31, 2014, in the County of Sacramento, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, who did unlawfully take money and personal property of a value exceeding \$950, to wit MONEY, the property of the STATE OF CALIFORNIA.

COUNT 99

On and between October 1, 2014 – October 31, 2014, in the County of Sacramento, the crime of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, who with the intent to defraud the State of California did submit a false or fraudulent claim for payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number 187100.

COUNT 100

On and between October 1, 2014 – October 31, 2014, in violation of Penal Code section 115(a), in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States to wit DR7 number 187100.

COUNT-101

1 On and between November 1, 2014 – November 30, 2014, in the County of Sacramento, the
2 crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE
3 SECTION 487 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG,**
4 **MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** who did unlawfully
5 take money and personal property of a value exceeding \$950, to wit MONEY, the property of the
6 STATE OF CALIFORNIA.
7

8 COUNT 102

9 On and between November 1, 2014 – November 30, 2014, in the County of Sacramento, the
10 crime of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation
11 of Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
12 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,**
13 who with the intent to defraud the State of California did submit a false or fraudulent claim for
14 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
15 191238.
16

17 COUNT 103

18 On and between November 1, 2014 – November 30, 2014, in violation of Penal Code section
19 115(a), in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA**
20 **PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** did unlawfully and knowingly
21 procure and offer a false and forged instrument to be filed, registered, and recorded in a public
22 office within this state, which instrument, if genuine, might be filed, registered, and recorded
23 under a law of this state or the United States to wit DR7 number 191238.
24

25 COUNT 104

26 On and between December 1, 2014 – December 31, 2014, in the County of Sacramento, the
27 crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE
28

1 SECTION 487 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG,**
2 **MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** who did unlawfully
3 take money and personal property of a value exceeding \$950, to wit MONEY, the property of the
4 STATE OF CALIFORNIA.
5

6 COUNT 105

7 On and between December 1, 2014 – December 31, 2014, in the County of Sacramento, the
8 crime of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation
9 of Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
10 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,**
11 who with the intent to defraud the State of California did submit a false or fraudulent claim for
12 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
13 194760.
14

15 COUNT 106

16 On and between December 1, 2014 – December 31, 2014, in violation of Penal Code section
17 115(a), in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA**
18 **PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** did unlawfully and knowingly
19 procure and offer a false and forged instrument to be filed, registered, and recorded in a public
20 office within this state, which instrument, if genuine, might be filed, registered, and recorded
21 under a law of this state or the United States to wit DR7 number 194760.
22

23 Count 107

24 On and between January 1, 2015 – January 31, 2015, in the County of Sacramento, the crime
25 of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487
26 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ,**
27 **AND RECYCLE SERVICES ALLIANCE INC.,** who did unlawfully take money and personal
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1 property of a value exceeding \$950, to wit MONEY, the property of the STATE OF
2 CALIFORNIA.

3
4 COUNT 108

5 On and between January 1, 2015 – January 31, 2015, in the County of Sacramento, the crime
6 of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of
7 Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
8 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,**
9 who with the intent to defraud the State of California did submit a false or fraudulent claim for
10 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
11 198641.

12
13 COUNT 109

14 On and between January 1, 2015 – January 31, 2015, in violation of Penal Code section
15 115(a), in the County of Sacramento **SHENGCHIEN (JENSEN) TSENG, MAXAMINA**
16 **PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** did unlawfully and knowingly
17 procure and offer a false and forged instrument to be filed, registered, and recorded in a public
18 office within this state, which instrument, if genuine, might be filed, registered, and recorded
19 under a law of this state or the United States to wit DR7 number 198641.

20
21 COUNT 110

22 On and between February 1, 2015 – February 28, 2015, in the County of Sacramento, the
23 crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE
24 SECTION 487 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG,**
25 **MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** who did unlawfully
26 take money and personal property of a value exceeding \$950, to wit MONEY, the property of the
27 STATE OF CALIFORNIA.
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COUNT 111

On and between February 1, 2015 – February 28, 2015, in the County of Sacramento, the crime of SUBMITTING A FALSE OR FRAUDULENT PAYMENTS, in violation of Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** who with the intent to defraud the State of California did submit a false or fraudulent claim for payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number 202222.

COUNT 112

On and between February 1, 2015 – February 28, 2015, in violation of Penal Code section 115(a), in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States to wit DR7 number 202222.

COUNT 113

On and between March 1, 2015 – March 31, 2015, in the County of Sacramento, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** who did unlawfully take money and personal property of a value exceeding \$950, to wit MONEY, the property of the STATE OF CALIFORNIA.

COUNT 114

1 On and between March 1, 2015 – March 31, 2015, in the County of Sacramento, the crime
2 of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of
3 Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
4 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,**
5 who with the intent to defraud the State of California did submit a false or fraudulent claim for
6 payment pursuant to Public Resources Code section 14573 or 14573:5 to wit DR7 number
7 206678.
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COUNT 115(a)

On and between March 1, 2015 – March 31, 2015, in violation of Penal Code section 115(a),
in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ,**
AND RECYCLE SERVICES ALLIANCE INC., did unlawfully and knowingly procure and
offer a false and forged instrument to be filed, registered, and recorded in a public office within
this state, which instrument, if genuine, might be filed, registered, and recorded under a law of
this state or the United States to wit DR7 number 206678.

COUNT 116

On and between April 1, 2015 – April 30, 2015, in the County of Sacramento, the crime of
GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487
(a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ,**
AND RECYCLE SERVICES ALLIANCE INC., who did unlawfully take money and personal
property of a value exceeding \$950, to wit MONEY, the property of the STATE OF
CALIFORNIA.

COUNT 117

On and between April 1, 2015 – April 31, 2015, in the County of Sacramento, the crime of
SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of Public

1 Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
2 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,**
3 who with the intent to defraud the State of California did submit a false or fraudulent claim for
4 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
5 209426.
6

7 COUNT 118

8 On and between April 1, 2015 – April 30, 2015, in violation of Penal Code section 115(a), in
9 the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND**
10 **RECYCLE SERVICES ALLIANCE INC.,** did unlawfully and knowingly procure and offer a
11 false and forged instrument to be filed, registered, and recorded in a public office within this state,
12 which instrument, if genuine, might be filed, registered, and recorded under a law of this state or
13 the United States to wit DR7 number 209426.
14

15 COUNT 119

16 On and between May 1, 2015 – May 31, 2015, in the County of Sacramento, the crime of
17 GRAND THEFT OF PERSONAL PROPERTY, in violation **SHENGCHIEN (JENSEN)**
18 **TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** who did
19 unlawfully take money and personal property of a value exceeding \$950, to wit MONEY, the
20 property of the STATE OF CALIFORNIA.
21

22 COUNT 120

23 On and between May 1, 2015 – May 31, 2015, in the County of Sacramento, the crime of
24 SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of Public
25 Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
26 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,**
27 who with the intent to defraud the State of California did submit a false or fraudulent claim for
28

1 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
2 213289.

3
4 COUNT 121

5 On and between May 1, 2015 – May 31, 2015, in violation of Penal Code section 115(a), in
6 the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND**
7 **RECYCLE SERVICES ALLIANCE INC.**, did unlawfully and knowingly procure and offer a
8 false and forged instrument to be filed, registered, and recorded in a public office within this state,
9 which instrument, if genuine, might be filed, registered, and recorded under a law of this state or
10 the United States to wit DR7 number 213289.

11
12 COUNT 122

13 On and between June 1, 2015 – June 30, 2015, in the County of Sacramento, the crime of
14 GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487
15 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ,**
16 **AND RECYCLE SERVICES ALLIANCE INC.**, who did unlawfully take money and personal
17 property of a value exceeding \$950, to wit MONEY, the property of the STATE OF
18 CALIFORNIA.

19
20 COUNT 123

21 On and between June 1, 2015 – June 30, 2015, in the County of Sacramento, the crime of
22 SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of Public
23 Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
24 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**,
25 who with the intent to defraud the State of California did submit a false or fraudulent claim for
26 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
27 216513.
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COUNT 124

On and between June 1, 2015 – June 30, 2015, in violation of Penal Code section 115(a), in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States to wit DR7 number 216513.

COUNT 125

On and between July 1, 2015 – July 31, 2015, in the County of Sacramento, the crime of **GRAND THEFT OF PERSONAL PROPERTY**, in violation of **PENAL CODE SECTION 487 (a)**, a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, who did unlawfully take money and personal property of a value exceeding \$950, to wit **MONEY**, the property of the **STATE OF CALIFORNIA**.

COUNT 126

On and between July 1, 2015 – July 31, 2015, in the County of Sacramento, the crime of **SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT**, in violation of Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, who with the intent to defraud the State of California did submit a false or fraudulent claim for payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number 220770.

COUNT 127

1 On and between July 1, 2015 – July 31, 2015, in violation of Penal Code section 115(a), in
2 the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND**
3 **RECYCLE SERVICES ALLIANCE INC.**, did unlawfully and knowingly procure and offer a
4 false and forged instrument to be filed, registered, and recorded in a public office within this state,
5 which instrument, if genuine, might be filed, registered, and recorded under a law of this state or
6 the United States to wit DR7 number 220770.

8 COUNT 128

9 On and between August 1, 2015 – August 31, 2015, in the County of Sacramento, the crime
10 of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487
11 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ,**
12 **AND RECYCLE SERVICES ALLIANCE INC.**, who did unlawfully take money and personal
13 property of a value exceeding \$950, to wit MONEY, the property of the STATE OF
14 CALIFORNIA.

16 COUNT 129

17 On and between August 1, 2015 – August 31, 2015, in the County of Sacramento, the crime
18 of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of
19 Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
20 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,**
21 who with the intent to defraud the State of California did submit a false or fraudulent claim for
22 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
23 226824.

25 COUNT 130

26 On and between August 1, 2015 – August 31, 2015, in violation of Penal Code section
27 115(a), in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA**
28

1 **PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, did unlawfully and knowingly
2 procure and offer a false and forged instrument to be filed, registered, and recorded in a public
3 office within this state, which instrument, if genuine, might be filed, registered, and recorded
4 under a law of this state or the United States to wit DR7 number 226824.
5

6 COUNT 131

7 On and between September 1, 2015 – September 30, 2015, in the County of Sacramento, the
8 crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE
9 SECTION 487 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG,**
10 **MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, who did unlawfully
11 take money and personal property of a value exceeding \$950, to wit MONEY, the property of the
12 STATE OF CALIFORNIA.
13

14 COUNT 132

15 On and between September 1, 2015 – September 30, 2015, in the County of Sacramento, the
16 crime of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation
17 of Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
18 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**,
19 who with the intent to defraud the State of California did submit a false or fraudulent claim for
20 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
21 227560.
22

23 COUNT 133

24 On and between September 1, 2015 – September 30, 2015, in violation of Penal Code
25 section 115(a), in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG,**
26 **MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, did unlawfully and
27 knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in
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1 a public office within this state, which instrument, if genuine, might be filed, registered, and
2 recorded under a law of this state or the United States to wit DR7 number 227560.

3
4 COUNT 134

5 On and between October 1, 2015 – October 31, 2015, in the County of Sacramento, the
6 crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE
7 SECTION 487 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG,**
8 **MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** who did unlawfully
9 take money and personal property of a value exceeding \$950, to wit MONEY, the property of the
10 STATE OF CALIFORNIA.

11
12 COUNT 135

13 On and between October 1, 2015 – October 31, 2015, in the County of Sacramento, the
14 crime of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation
15 of Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
16 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,**
17 who with the intent to defraud the State of California did submit a false or fraudulent claim for
18 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
19 231221.

20
21 COUNT 136

22 On and between October 1, 2015 – October 31, 2015, in violation of Penal Code section
23 115(a), in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA**
24 **PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** did unlawfully and knowingly
25 procure and offer a false and forged instrument to be filed, registered, and recorded in a public
26 office within this state, which instrument, if genuine, might be filed, registered, and recorded
27 under a law of this state or the United States to wit DR7 number 231221.
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COUNT 137

On and between November 1, 2015 – November 30, 2015, in the County of Sacramento, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, who did unlawfully take money and personal property of a value exceeding \$950, to wit MONEY, the property of the STATE OF CALIFORNIA.

COUNT 138

On and between November 1, 2015 – November 30, 2015, in the County of Sacramento, the crime of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation of Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, who with the intent to defraud the State of California did submit a false or fraudulent claim for payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number 237103.

COUNT 139

On and between November 1, 2015 – November 30, 2015, in violation of Penal Code section 115(a), in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.**, did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States to wit DR7 number 237103.

COUNT 140

1 On and between December 1, 2015 – December 31, 2015, in the County of Sacramento, the
2 crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE
3 SECTION 487 (a), a felony was committed by **SHENGCHIEN (JENSEN) TSENG,**
4 **MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** who did unlawfully
5 take money and personal property of a value exceeding \$950, to wit MONEY, the property of the
6 STATE OF CALIFORNIA.
7

8 COUNT 141

9 On and between December 1, 2015 – December 31, 2015, in the County of Sacramento, the
10 crime of SUBMITTING A FALSE OR FRAUDULENT CLAIM FOR PAYMENT, in violation
11 of Public Resources Code section 14591 (b) (1) (A) a felony was committed by **SHENGCHIEN**
12 **(JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,**
13 who with the intent to defraud the State of California did submit a false or fraudulent claim for
14 payment pursuant to Public Resources Code section 14573 or 14573.5 to wit DR7 number
15 238589.
16

17 COUNT 142

18 On and between December 1, 2015 – December 31, 2015, in violation of Penal Code section
19 115(a), in the County of Sacramento, **SHENGCHIEN (JENSEN) TSENG, MAXAMINA**
20 **PEREZ, AND RECYCLE SERVICES ALLIANCE INC.,** did unlawfully and knowingly
21 procure and offer a false and forged instrument to be filed, registered, and recorded in a public
22 office within this state, which instrument, if genuine, might be filed, registered, and recorded
23 under a law of this state or the United States to wit DR7-number 238589.
24

25 COUNT 143

26 On and between June 1, 2015 – June 30, 2015, in the County of Sacramento,
27 **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES**
28

1 **ALLIANCE INC.**, offered as true at a trial, proceeding, inquiry and investigation whatever,
2 authorized by law, a book, paper, document, record and instrument in writing, knowing the same
3 to have been forged, fraudulently altered, and ante-dated in violation of Penal Code section 132.

4 To wit: DR7 216513

5
6 Count 144

7 On and between June 1, 2015 – June 30, 2015, in the County of Sacramento,

8 **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES**

9 **ALLIANCE INC.**, did unlawfully prepare a false and ante-dated book, paper, record, instrument
10 in writing, and other matter and thing, with intent to produce it, and to allow it to be produced for
11 a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and inquiry
12 whatever, authorized by law in violation of Penal Code section 134. To wit: DR7 216513

13
14 COUNT 145

15 On and between July 1, 2015 – July 31, 2015, in the County of Sacramento,

16 **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES**

17 **ALLIANCE INC.**, offered as true at a trial, proceeding, inquiry and investigation whatever,
18 authorized by law, a book, paper, document, record and instrument in writing, knowing the same
19 to have been forged, fraudulently altered, and ante-dated in violation of Penal Code section 132.

20 To wit: DR7 220770

21
22 Count 146

23 On and between July 1, 2015 – July 31, 2015, in the County of Sacramento,

24 **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES**

25 **ALLIANCE INC.**, did unlawfully prepare a false and ante-dated book, paper, record, instrument
26 in writing, and other matter and thing, with intent to produce it, and to allow it to be produced for
27

1 a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and inquiry
2 whatever, authorized by law in violation of Penal Code section 134. To wit: DR7 220770

3
4 COUNT 147

5 On and between August 1, 2015 – August 31, 2015, in the County of Sacramento,
6 **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES**
7 **ALLIANCE INC.**, offered as true at a trial, proceeding, inquiry and investigation whatever,
8 authorized by law, a book, paper, document, record and instrument in writing, knowing the same
9 to have been forged, fraudulently altered, and ante-dated in violation of Penal Code section 132.
10 To wit: DR7 226824

11 Count 148

12 On and between August 1, 2015 – August 31, 2015, in the County of Sacramento,
13 **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES**
14 **ALLIANCE INC.**, did unlawfully prepare a false and ante-dated book, paper, record, instrument
15 in writing, and other matter and thing, with intent to produce it, and to allow it to be produced for
16 a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and inquiry
17 whatever, authorized by law in violation of Penal Code section 134. To wit: DR7 226824

18
19 COUNT 149

20 On and between September 1, 2015 – September 30, 2015, in the County of Sacramento,
21 **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES**
22 **ALLIANCE INC.**, offered as true at a trial, proceeding, inquiry and investigation whatever,
23 authorized by law, a book, paper, document, record and instrument in writing, knowing the same
24 to have been forged, fraudulently altered, and ante-dated in violation of Penal Code section 132.
25 To wit: DR7 227560

26
27 Count 150

1 On and between September 1, 2015 – September 30, 2015, in the County of Sacramento,
2 **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES**
3 **ALLIANCE INC.**, did unlawfully prepare a false and ante-dated book, paper, record, instrument
4 in writing, and other matter and thing, with intent to produce it, and to allow it to be produced for
5 a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and inquiry
6 whatever, authorized by law in violation of Penal Code section 134. To wit: DR7 227560

8 COUNT 151

9 On and between October 1, 2015 – October 31, 2015, in the County of Sacramento,
10 **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES**
11 **ALLIANCE INC.**, offered as true at a trial, proceeding, inquiry and investigation whatever,
12 authorized by law, a book, paper, document, record and instrument in writing, knowing the same
13 to have been forged, fraudulently altered, and ante-dated in violation of Penal Code section 132.
14 To wit: DR7 231221

16 Count 152

17 On and between October 1, 2015 – October 31, 2015, in the County of Sacramento,
18 **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES**
19 **ALLIANCE INC.**, did unlawfully prepare a false and ante-dated book, paper, record, instrument
20 in writing, and other matter and thing, with intent to produce it, and to allow it to be produced for
21 a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and inquiry
22 whatever, authorized by law in violation of Penal Code section 134. To wit: DR7 231221

24 COUNT 153

25 On and between November 1, 2015 – November 30, 2015, in the County of Sacramento,
26 **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES**
27 **ALLIANCE INC.**, offered as true at a trial, proceeding, inquiry and investigation whatever,
28

1 authorized by law, a book, paper, document, record and instrument in writing, knowing the same
2 to have been forged, fraudulently altered, and ante-dated in violation of Penal Code section 132.

3 To wit: DR7 237103

4
5 Count 154

6 On and between November 1, 2015 – November 30, 2015, in the County of Sacramento,
7 **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES**
8 **ALLIANCE INC.**, did unlawfully prepare a false and ante-dated book, paper, record, instrument
9 in writing, and other matter and thing, with intent to produce it, and to allow it to be produced for
10 a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and inquiry
11 whatever, authorized by law in violation of Penal Code section 134. To wit: DR7 237103

12
13 ~~COUNT 155~~

14 On and between December 1, 2015 – December 31, 2015, in the County of Sacramento,
15 **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES**
16 **ALLIANCE INC.**, offered as true at a trial, proceeding, inquiry and investigation whatever,
17 authorized by law, a book, paper, document, record and instrument in writing, knowing the same
18 to have been forged, fraudulently altered, and ante-dated in violation of Penal Code section 132.

19 To wit: DR7 238589

20
21 Count 156

22 On and between December 1, 2015 – December 31, 2015, in the County of Sacramento,
23 **SHENGCHIEN (JENSEN) TSENG, MAXAMINA PEREZ, AND RECYCLE SERVICES**
24 **ALLIANCE INC.**, did unlawfully prepare a false and ante-dated book, paper, record, instrument
25 in writing, and other matter and thing, with intent to produce it, and to allow it to be produced for
26 a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and inquiry
27 whatever, authorized by law in violation of Penal Code section 134. To wit: DR7 238589

Count 157 to Count 160 14 of 15 yes

1
2 On or about November 24, 2014, in violation of PC 118, in the County of Sacramento,
3 **MAXAMINA PEREZ**, did unlawfully, under penalty of perjury, declare as true, that which was
4 known to be false, to wit, the total refund value owed on transaction number 5393649.
5

6 Count 158

7 On or about November 24, 2014, in violation of PC 118, in the County of Sacramento,
8 **MAXAMINA PEREZ**, did unlawfully, under penalty of perjury, declare as true, that which was
9 known to be false, to wit, the total refund value owed on transaction number 5393650.
10

11 Count 159

12 On or about November 24, 2014, in violation of PC 118, in the County of Sacramento,
13 **MAXAMINA PEREZ**, did unlawfully, under penalty of perjury, declare as true, that which was
14 known to be false, to wit, the total refund value owed on transaction number 5393639.
15

16 Count 160

17 On or about January 28, 2015, in violation of PC 118, in the County of Sacramento,
18 **ALEXANDRA MARTINEZ aka ALEJANDRA LOZARO**, did unlawfully, under penalty of
19 perjury, declare as true, that which was known to be false, to wit, the total refund value owed on
20 transaction number 5570599.

21 Count 161

22 On or about January 28, 2015, in violation of PC 118, in the County of Sacramento,
23 **ALEXANDRA MARTINEZ aka ALEJANDRA LOZARO**, did unlawfully, under penalty of
24 perjury, declare as true, that which was known to be false, to wit, the total refund value owed on
25 transaction number 5570601.
26

27 Count 162
28

1 On or about march 5, 2015, in violation of PC 118, in the County of Sacramento, **ESTELA**
2 **VERONICA CASTILLO**, did unlawfully, under penalty of perjury, declare as true, that which
3 was known to be false, to wit, the total refund value owed on transaction number 5666177.

4
5 Count 163

6 On or about March 5, 2015, in violation of PC 118, in the County of Sacramento, **ESTELA**
7 **VERONICA CASTILLO**, did unlawfully, under penalty of perjury, declare as true, that which
8 was known to be false, to wit, the total refund value owed on transaction number 5666142.

9 Count 164

10 On or about January 26, 2015, in violation of PC 118, in the County of Sacramento,
11 **MARLENE DAVALOS-MENDEZ**, did unlawfully, under penalty of perjury, declare as true,
12 that which was known to be false, to wit, the total refund value owed on
13 transaction number 5565252.

14
15 Count 165

16 On or about January 26, 2013, in violation of PC 118, in the County of Sacramento,
17 **MARLENE DAVALOS-MENDEZ**, did unlawfully, under penalty of perjury, declare as true,
18 that which was known to be false, to wit, the total refund value owed on
19 transaction number 5565256.

20
21 Count 166

22 On or about March 7, 2015, in violation of PC 118, in the County of Sacramento,
23 **ALEJANDRA MARTINEZ aka ALEJANDRA LOZARO**, did unlawfully, under penalty of
24 perjury, declare as true, that which was known to be false, to wit, the total refund value owed on
25 transaction number 5672337.

26 Special Allegation 12022.6(a)(4)
27
28

1 It is further alleged that in the commission of the above offense(s) the said SHENGCHIEN
2 (JENSEN) TSENG, MAXAMINA PEREZ, MARLENE DAVALOS-MENDEZ, ESTELLA
3 VERONICA CASTILLO, ALEXANDRA MARTINEZ aka ALEJANDRA LOZARO,
4 RECYCLE SERVICES ALLIANCE, INC., with the intent to do so, took, damaged, and
5 destroyed property of a value exceeding \$3,200,000, within the meaning of Penal Code section
6 12022.6(a)(4).
7

8 Special Allegation 186.2(a)(27)

9 It is further alleged, pursuant to Penal Code section 186.2(a)(27) that the offenses set forth in
10 counts 1-166 are offenses related to fraud or theft from the state's beverage container recycling
11 program.
12

13 Special Allegation 115(c)(2)

14 It is further alleged, pursuant to PC 115(c)(2), that the SHENGCHIEN (JENSEN) TSENG,
15 MAXAMINA PEREZ, was convicted of more than one violation of PC 115(a) in a single
16 proceeding, with the intent to defraud another and the violations resulted in a cumulative financial
17 loss which exceeded one hundred thousand dollars (\$100,000).
18

19 Special Allegation 186.11(a)

20 It is further alleged, pursuant to Penal Code 186.11(a), that the offenses set forth in counts 1-
21 166 are related felonies, a material element of which is fraud and embezzlement, which involve a
22 pattern of related felony conduct, and the pattern of related felony conduct involves the taking of
23 more than Five Hundred Thousand Dollars (\$500,000).
24

25 Date of Discovery

26 It is further alleged that the above violations were not discovered until April 21, 2015 when
27 CalRecycle auditor Saihra Posas received a telephone call on the CalRecycle tip line from a
28

1 former employee of DM Recycling who had knowledge of fraudulent activities by DM Recycling
2 and Recycling Services Alliance. No victim of said violations and no law enforcement agency
3 chargeable with the investigation and prosecution of said violations had actual and constructive
4 knowledge of said violations prior to said date because no other person brought the matter to their
5 attention.
6

7 **NOTICE: Conviction of this offense will require the defendant to provide DNA samples**
8 **and print impressions pursuant to Penal Code sections 296 and 296.1. Willful refusal to**
9 **provide the samples and impressions is a crime.**

10
11 **NOTICE: The People of the State of California intend to present evidence and seek jury**
12 **findings regarding all applicable circumstances in aggravation, pursuant to Penal Code**
13 **section 1170(b) and *Cunningham v. California* (2007) 549 U.S. 270.**

14
15
16 **NOTICE: Any allegation making a defendant ineligible to serve a state prison sentence in**
17 **the county jail shall not be subject to dismissal pursuant to Penal Code section 1385.**

<u>DEFENDANT</u>	<u>CII</u>	<u>DOB</u>	<u>BOOKING</u> <u>NO.</u>	<u>BAIL</u> <u>RECOM'D</u>	<u>CUSTODY</u> <u>RTN DATE</u>
SHENGCHIEN (JENSEN) TSENG		07/21/1968		\$1,000,000	
MAXAMINA PEREZ		06/08/1967		\$1,000,000	
MARLENE DAVALOS-MENDEZ		04/16/1989		\$1,000,000	
ESTELLA VERONICA CASTILLO		08/08/1982		\$1,000,000	
ALEJANDRA MARTINEZ (LOZARO)		05/22/1991		\$1,000,000	

WITNESS LIST

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- 1. Alicia Davenport
- 2. David Lazier
- 3. ~~Irene Brazil~~ 
- 4. Don Wilson
- 5. Tonya Harrison
- 6. Darrell Early
- 7. Brian Kivett
- 8. Holly Schwartz
- 9. James Meek
- 10. Andrea Amaral
- 11. Connie Chen

12 SIAHRA POSAS

A TRUE BILL

XAVIER BECERRA

Attorney General

By: _____

Sacramento County

DIANA CALLAGHAN

Grand Jury Foreman

Deputy Attorney General

Date: _____

Date: _____

GRAND JURY INDICTMENT HEARING LIST OF EXHIBITS

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- Exhibit 1: Grand Jury Indictment Hearing List of Exhibits
- Exhibit 2: Application for Certification
- Exhibit 3: CalRecycle Program Slides
- Exhibit 4: DORRIS Receiver Screen Shot
- Exhibit 5: DORRIS Processor Screen Shot (5 pages)
- Exhibit 6: Page of 4 photographs
- Exhibit 7: Page of legitimate weight tickets
- Exhibit 8: List of Affiliated Revoked Recycling Centers
- Exhibit 9: CD of revocation Letters to affiliated Recycling Centers
- Exhibit 10: Letter to Jensen Tseng Re Manual Pass and Reprint
- Exhibit 11: Secretary of State Documents
- Exhibit 12: Hand modified weight tickets
- Exhibit 13: Example of reprinted weight tickets
- Exhibit 14: 6 page document regarding changing weight tickets
- Exhibit 15: 5 page document containing excerpts on how to change weight tickets
- Exhibit 16: 1 page email from RePlanet re changing weights
- Exhibit 17: 4 page document regarding reprinted transactions
- Exhibit 18: 8 page document of changed weight tickets found in SW
- Exhibit 19: 4 page Weather Report
- Exhibit 20: Weigh Master Inspection Report
- Exhibit 21: 6 page Weigh Master License
- Exhibit 22: Signature Card for RSA Account
- Exhibit 23: Chart of Funds Received by RSA from Related Companies
- Exhibit 24: Chart of funds Distributed to related companies from RSA
- Exhibit 25: Photo of Jensen Tseng
- Exhibit 26: Photo of Maximina Perez

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- Exhibit 27: Photo of Estela Veronica Castillo
- Exhibit 28: Photo of Alejandra Martinez aka Alejandra Lazaro
- Exhibit 29: Photo of Marlene Davalos-Mendez
- Exhibit 30: CD of RSA damages to CalRecycle
- Exhibit 31: CD of RSA Overt Acts
- Exhibit 32: 2 page document regarding Manual Pass transactions
- Exhibit 33: 4 page document regarding Reprinted Weight Tickets
- Exhibit 34: Reprints after letter
- Exhibit 35: 161 Page Packet of Randomly Selected Weight Tickets from Audit
- Exhibit 36: 40 page packet of DR7s related to randomly selected weight tickets
- Exhibit 35: 45 page document of randomly sampled weight tickets
- Exhibit 38: 16 pages of DR7s Related to random weight tickets
- * Exhibit 39: 1 Page List of Loss by Month
- * Exhibit 40: CD of CalRecycly loss based on changes to weight tickets
- * Exhibit 41: 1 Page Document of Manual Ticket Losses
- Exhibit 42: DR7s and pay warrants for all years
- Exhibit 43: 10 pages of shipping reports related to perjury counts
- Exhibit 44: 1 Page Chart re: Single Pass during audit period
- Exhibit 45: 1 Page Chart re: Reprint during audit period
- Exhibit 46: CD of weight tickets during audit period
- Exhibit 47: Cardinal WinVRS Screen Shots (13 pages)
- Exhibit 48: CD with Cardinal Spread Sheet Syslog *changed into*
- Exhibit 49: CD with Cardinal Spread Sheet Tran.XLXS *with type*
- Exhibit 50: Chart of Percentage Ownership in all Related Companies
- Exhibit 51: CD with Spread Sheet of Changed Weight Tickets from Cardinal Evidence